

was subjected to a hostile work environment and targeted for retaliation after she made an internal complaint. She also claims that she was constructively discharged.

Plaintiff's claims fail as a matter of law, and there is no material factual dispute that prevents entry of an order granting summary judgment in favor of Defendant. AHOM is submitting contemporaneously with this Motion a proposed Order and a Statement of Material Facts and the portions of the record that support its Statement. AHOM shall submit its supporting brief in accordance with Local Rule 7.5.

WHEREFORE, AHOM requests that judgment be entered in its favor and against Plaintiff, that the Court grant summary judgment in favor of Defendant, and dismiss Plaintiff's Complaint in its entirety, with prejudice.

Respectfully submitted,

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s/ Jo Bennett

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Dated: February 18, 2023

CERTIFICATION OF NON-CONCURRENCE

I, Jo Bennett, certify that Plaintiff, Patricia Holmes, does not concur in Defendant's Motion for Summary Judgment.

s/ Jo Bennett

Jo Bennett

Dated: February 18, 2023